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BEFORE THE U.S. DEPARTMENT OF LABOR

In the matter of:)
)
JUAN LOZADA-LEONI,)
Complainant,)
)
V.) Case No. 2018-SOX-00004
)
MONEYGRAM INTERNATIONAL,)
Respondent.)

ORAL DEPOSITION OF
JUAN LOZADA-LEONI
JUNE 19, 2018
VOLUME 2

ORAL DEPOSITION OF JUAN LOZADA-LEONI, produced as a witness
at the instance of the Respondent, and duly sworn, was taken in
the above-styled and numbered cause on the 19th day of June,
2018, from 9:59 a.m. to 3:00 p.m., before AMBER KIRTON, CSR in
and for the State of Texas, reported by machine shorthand, at the
Law Offices of Juan Antonio Lozada, PLLC, 3305 W. Slaughter Lane
#2, Austin, Texas, pursuant to the Federal Rules of Civil
Procedure.

1 MR. BARCUS: I didn't even get to finish asking my
2 question, Mr. Kardell. Your client interrupted me. Perhaps if I
3 could ask the question.

4 MR. KARDELL: Okay. Okay. Let's try that. Why
5 don't you -- also, let me instruct my client. If there is a
6 problem with the manner in which he's asked the question, go
7 ahead and try to answer it to the best of your ability and then
8 note the objectionable part of his question as to how he posed
9 it.

10 Q. (BY MR. BARCUS) Okay. So in this paragraph we're
11 looking at that starts, "Okay, it's the same thing with you. I
12 know your heart is in the right place. You were getting things
13 done." Juan Manuel then goes on to give you both positive
14 feedback and negative feedback on your job performance, correct?

15 A. Yes.

16 Q. And that's something he did throughout this
17 conversation. He told you what you were doing well and he told
18 you what you could be doing better, correct?

19 A. No, that's not correct.

20 Q. What's incorrect about that?

21 A. I don't think he was very positive until that point. I
22 think I brought it in -- I actually said, wait a second. This is
23 actually the second part of a conversation, okay. We actually
24 had a conversation at the very end and I think we have a
25 transcription of this. I told him I don't think this formula is

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1 BEFORE THE U.S. DEPARTMENT OF LABOR
2 In the Matter of:
3 JUAN LOZADA-LEONI,)
 Complainant,)
4)
)
5 VS.) Case No.2018-SOX-00004
)
6)
 MONEYGRAM INTERNATIONAL,)
7 Respondent.)
8
9

10 REPORTER'S CERTIFICATION
 DEPOSITION OF
 JUAN LOZADA-LEONI
 JUNE 19, 2018

11
12 I, AMBER KIRTON, Certified Shorthand Reporter in and for
13 the State of Texas, hereby certify to the following:

14 That the witness, JUAN LOZADA-LEONI, was duly sworn by the
15 officer and that the transcript of the oral deposition is a true
16 record of the testimony given by the witness:

17 That the deposition transcript was submitted on
18 July 13, 2018, to the witness or to the attorney for
19 Complainant for examination, signature and return to Veritext
20 Legal Solutions by August 15, 2018;

21 That the amount of time used by each party at the
22 deposition is as follows:

23 Mr. John M. Barcus - 03 hour(s): 35 minute(s)

 Mr. Steve Kardell - 00 hour(s): 00 minute(s)

24
25 That pursuant to information given to the deposition

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1 officer at the time said testimony was taken, the following
2 includes all parties of record:

3 Mr. Steve Kardell, Attorney for Complainant

4 Mr. John M. Barcus, Attorney for Respondent

5 That _____ is the deposition officer's charges to the
6 Respondent for preparing the original deposition transcript and
7 any copies of exhibits;

8 I further certify that I am neither counsel for, related
9 to, nor employed by any of the parties or attorney in the action
10 in which this proceeding was taken, and further that I am not
11 financially or otherwise interested in the outcome of the
12 action.

13 Certified to by me this 10th day of July, 2018.

14 

15 Amber Kirton, CSR

16 Texas CSR #8110

17 Expiration Date: 12/31/19

18 Firm Registration No. 571

19 Veritext Legal Solutions

20 300 Throckmorton Street, Suite 1600

21 Fort Worth, Texas 76102

22 (817) 336-3042
23
24
25